



August 18, 1999

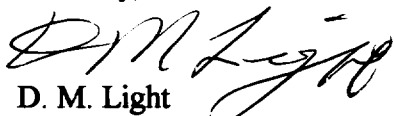
Mr. Michael McAteer
U. S. EPA - Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

Re: Sauget Sites Area I - January 21, 1999 Administrative Order by Consent (AOC)
• **August 1999 Monthly Report**

Dear Mr. McAteer,

Enclosed is the August 1999 Monthly Report for the Sauget Sites Area I. This submittal is in fulfillment of the monthly requirements of Section 2.4 Reporting, of the January 21, 1999 Final Administrative Order by Consent for Sauget Sites Area I, Sauget and Cahokia, Illinois.

Sincerely,


D. M. Light
Manager, Remedial Projects
Solutia Inc.

cc:

T. Gouger - USACE
C. Morin - IEPA
Mayor M. King - Cahokia
Sauget File - Solutia

Sauget Sites Area I - Sauget, Illinois

AOC - EECA / RIFS

Monthly Report

Date of Report: August 18, 1999
Period Covered: July 16, 1999 - August 17, 1999
Next Report Period: August 18, 1999 - September 18, 1999

Work Performed during the reporting period

- None

Work scheduled for next reporting period

- Air sampling to begin in late August.
- Pending approval of the SSP in August, September 8 initiation of EECA/RIFS SSP sampling is planned.

Problems and Solutions

- None

Submittal Schedule Status (see attached)

- A revised submittal of the SSP with revised schedule was made June 25, 1999. The June 25 SSP submittal was disapproved by U.S. EPA July 16, 1999. Solutia met with the Agencies in Collinsville, IL July 27 to discuss and resolve the remaining issues preventing approval. A revised submittal of the SSP was made August 13, 1999 and is now under review by the Agencies.

Issues under review

- **Dead Creek Flooding** - A hydraulic study of Dead Creek has been completed. Preliminary results indicate that elimination of the restricted culverts will not appreciably affect the flooding conditions. A supplemental study was completed and submitted to the Agencies on July 30 for review.
- **UAO to address flooding** - U. S. EPA UAO - Docket No. V-W-99-C-554 - was issued to Solutia and received June 28. The UAO requires replacement of the culverts

on Dead Creek to address flooding of Dead Creek. An alternative proposal to address the cause of the flooding and the contaminated sediments directly was made to U. S. EPA by Solutia July 8 at a conference in Cahokia. This proposal was formally submitted to U. S. EPA in Solutia's July 17, 1999 Response to the UAO. As committed to in the July 8 Cahokia conference and repeated in Solutia's July 17, 1999 Response, Solutia submitted to U.S. EPA in a July 30th correspondence, commitment to implement some additional short term plans to address the flooding and the sediments under the UAO. The proposals made in both the July 17th and July 30th correspondences remain under review by the Agencies.

Comments

January 21, 1999 Sauget Area I AOC

SCHEDULE
(8/99 Revision)

- | | |
|------------------------------------------------------|------------------------------------------------------------------------------------------------------------|
| 1. Designation of Contractor | Completed 3/10/99 ¹ |
| 2. Designation of Other Contractors | 5 Business Days Before Start of Work |
| 3. Designation of Project Coordinator | Completed |
| 4. Submit Support Sampling Plan (SSP) | Submitted February 22, 1999 |
| 5. Submit Revised SSP | April 8, 1999 ²
June 25, 1999 ³
August 30, 1999⁴
مايو |
| 6. Obtain Access Agreements | July 1, 1999 ⁵
September 17, 1999 ⁶ |
| 7. Submit Health and Safety Plan (HASP) | With Revised SSP (Item 5) submittal |
| 8. Submit Quality Assurance and Sampling Plan (QAPP) | With Revised SSP (Item 5) submittal |

¹ Per March 10, 1999 memo DML to M. McAteer re "Notification of Contractors and Contractor Qualifications"

² Per 3/19/99 e-mail from M. McAteer to M. Light, AOC schedule modified to "21 days after receipt of U. S. EPA comments from the February 22, 1999 SSP submittal". U. S. EPA comments on the 2/22/99 SSP submittal were received 3/19/99. Revised SSP submitted to U. S. EPA April 8, 1999 and disapproved June 3, 1999.

³ April 8, 1999 SSP submittal disapproved June 3, 1999. Revised plan due to the Agency June 25, 1999. Revised plan submitted June 25th as required.

⁴ June 25th SSP submittal disapproved July 16, 1999 and resubmitted ~~August 30, 1999~~ ^{مايو}

⁵ Per 5/21/99 phone call from M. McAteer to M. Light, AOC schedule modified to "July 1, 1999 with interim report due on June 15, 1999", consistent with Solutia's request in a May 18, 1999 Access report and request for extension.

⁶ Access agreements update issued August 15, 1999 with request to extend deadline to September 17, 1999. Extensions to September 17, 1999 was granted by Mike McAteer in an August 17, 1999 e-mail to Mike Light.

January 21, 1999 Sauget Area LAOC

SCHEDULE (Cont.)
(8/99 Revision)

9. Sampling Notification	10 Business Days Prior to Start of Work
10. Submit Data Report	TBD (Pending approval of SSP Work Schedule)
11. Submit EE/CA Report	60 Calendar Days After Data Report Submittal
12. Submit Revised EE/CA Report	21 Calendar Days After Receipt of EPA Comments
13. Submit RI/FS Report	90 Calendar Days After Data Report Submittal
14. Submit Revised RI/FS Report	21 Calendar Days After Receipt of EPA Comments
15. Progress Reports	Monthly Beginning February 19, 1999